

November 17, 2005

On behalf of the United Conference of Catholic Bishops I urge the Federal Communications Commission to complete its proceedings in the matter of *Public Interest Obligations of TV Broadcasters and Licensees* (MM Docket No. 99-360) and in the matter of *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations* (MM 20 Docket No. 00-168), and issue Reports and Orders in these matters before June 1, 2006.

Today, even as the broadcasting industry continues to benefit from its subsidized use of the public airwaves, broadcasters' observance of meaningful public interest obligations have declined. We ask that, in exchange for the use of tens of billions of dollars worth of new spectrum rights, broadcasters be required to put forth a substantial effort to provide programming that better serves the public.

In the last two decades, there has been a shift in control over the public airwaves into the hands of a shrinking number of media owners. *At the same time the FCC permitted this greater consolidation of broadcast outlets, it dismantled regulations which helped prevent broadcast licensees from ignoring their obligations to serve the public interest.* As a result, there are fewer broadcast stations that are willing to provide local and religious programming. According to a recent report by the Media Policy Program of the Campaign Legal Center, only 3.5 percent of digital broadcasts were devoted to religious programming. The Catholic bishops of the United States are concerned that, with the imminent conversion to all-digital broadcasts, the already limited amount of religious programming will decline even further.

The USCCB is committed to maintaining a place for religion and values on the public airwaves and to programming that inspires, informs and educates. USCCB is in regular contact with nearly 200 Catholic dioceses throughout the United States. Catholic programmers produce a variety of radio programs, including talk shows featuring religious issues and family matters, to local public affairs programs, sacred music concerts, and children's programs. A significant number of dioceses that produce television programs and public service announcements have consistently informed us of the

financial burden and increased difficulty involved in obtaining airtime on local broadcast stations. As a result, the bishops are concerned that local broadcasters' programming decisions regarding religious and educational programming is more deeply rooted in their desire for commercial gain, rather than *in meeting their statutory obligations* to serve their communities' needs and interests.

We urge the FCC to adopt regulations that would provide broadcasters incentives to air programs produced by religious institutions, organizations, schools, and other community-based organizations. Such regulations could include shorter periods for license renewal review; or a provision that would ensure that local licensees will understand and meet local religious needs and interests with responsive programming.

Over the years, USCCB has advocated for legislation and regulations that would ensure broadcast licensees understand and meet local needs and interests with responsive programming by: (a) amplifying the voices and views of the public, including community organizations and noncommercial religious entities, in broadcast media; (b) increasing the amount of local news and public affairs programming (including religious programs and public service announcements); and (c) increasing the amount of programming that serves the educational needs of children, persons with disabilities, and underserved communities.

As chairman of the USCCB Committee for Communications, I respectfully urge you to reconfirm broadcasters' obligation to serve their local communities of license with programming that *responds to the needs and interests of the local community, including the community's religious needs*. Thank you for your consideration of our views.

Sincerely,

A handwritten signature in dark ink, reading "Gerald Kicanas". The signature is written in a cursive, flowing style with a large initial "G".

Most Reverend Gerald F. Kicanas
Bishop of Tucson
Chairman, Communications Committee